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Pierce Contractors, Inc.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

The Mnariak Law Group, Inc.

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1 PIERCE CONTRACTORS, INC., the Debtor and debtor-in-possession herein (“Debtor”)
2 filed its Chapter 11 case on January 31, 2020, and submits its fifth Status Conference Statement as
3 follows:

4 Debtor apologizes for the late submission. Debtor has been working hard to try to line up
5 funding and reach a deal that would satisfy both the source of funding as well as both Deed of Trust
6 holders. In the end, such discussions, which continued up until the last minute, failed. Without such
7 an agreement, a confirmable plan cannot be funded until the liens on Mr. Pierce’s settlement funds
8 have been cleared. At this time, there is no way of knowing when that will be. Debtor understands
9 and acknowledges that the case should be dismissed on this basis and hereby withdraws its
10 opposition to the motion to dismiss.

11 **THE MLNARIK LAW GROUP, INC.**

12 Dated: June 2, 2021

13 /s/ William W. Winters

14 William W. Winters
15 Attorney for Debtor